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Attorneys for Plaintiffs KEVIN WOODRUFF, on behalf
of himself and classes of those similarly situated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KEVIN WOODRUFF, on behalf of himself
and classes of those similarly situated,

Plaintiffs,

vs.

BROADSPECTRUM DOWNSTREAM
SERVICES, INC., formerly TIMEC
COMPANY, INC., a corporation,

Defendant.

CASE NO. 3:14-CV-04105-EMC

**JOINT STIPULATION TO EXTEND
BRIEFING AND HEARING SCHEDULE
ON PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND
[PROPOSED] ORDER THEREON**

Judge: Hon. Edward M. Chen
Ct. room: Courtroom 5 - 17th Floor
450 Golden Gate Avenue
San Francisco, CA

Firmwide: 143481779.2 052001.1047

CASE NO. 3:14-CV-04105-EMC

JOINT STIPULATION TO EXTEND SCHEDULE

1 Plaintiff Kevin Woodruff and Defendant Broadspectrum Downstream Services, Inc.,
2 formerly Timec Company, Inc., through their respective counsel, hereby stipulate as follows:

3 WHEREAS, at the last Case Management Conference held on September 22, 2016,
4 the parties advised the Court that they had reached a tentative settlement of this putative Class
5 Action. By Minute Order (ECF No. 70 dated September 22, 2016) the Court ordered the Plaintiff to
6 file his Motion for Preliminary Approval of the settlement by no later than October 27, 2016 with a
7 hearing (and further Case Management Conference) scheduled for December 8, 2016 at 1:30 p.m.;
8 and

9 WHEREAS, the parties are still in the process of finalizing the settlement but need
10 additional time for Timec to go through its payroll records and apportion class member hours
11 worked into "turnaround" and "maintenance" work which will be used in the formula to distribute
12 the settlement; and

13 WHEREAS, the parties are currently reviewing and discussing their draft written
14 settlement agreement but need additional time to finalize the distribution formula and other terms;
15 and

16 WHEREAS, no prior request for extensions in the briefing/hearing schedule have
17 been sought.

18 THEREFORE, the parties respectfully request that the Court continue the date for
19 Plaintiff to file a Motion for Preliminary Approval of the settlement by one week to November 3,
20 2016, that any opposition be filed by November 17 and any Reply by November 23, and that the
21 Preliminary Approval hearing and Case Management Conference be held on December 15, 2016 at
22 1:30 p.m. (with a Joint Case Management Conference Statement to be filed by December 8).

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24 ///

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SO STIPULATED.

DATED: October 20, 2016

/s/ Robert L. Zaletel

LINDBERGH PORTER
ROBERT L. ZALETEL
LITTLER MENDELSON, P.C.

Attorneys for Defendant
BROADSPECTRUM DOWNSTREAM
SERVICES, INC., formerly TIMEC
COMPANY, INC.

DATED: October 20, 2016

/s/ John T. Mullan

JOHN T. MULLAN
RUDY, EXELROD, ZIEFF & LOWE, LLP,

Attorneys for Plaintiffs KEVIN WOODRUFF,
on behalf of himself and classes of those
similarly situated

~~PROPOSED~~ ORDER

Pursuant to the Stipulation of the parties, for good cause appearing, the Court hereby vacates the Minute Order ECF No. 70 issued on September 22, 2016 and establishes the following new briefing hearing and Case Management Conference Schedule:

1. Plaintiff's Motion for Preliminary Approval of the settlement shall be filed by November 3, 2016 with any Opposition to be filed by November 17, 2016 and Reply by November 23, 2016, the hearing and Case Management Conference to be held December 15, 2016 at 1:30 p.m. A Joint Case Management Conference statement shall be filed by November 8.

DATED: 10/21, 2016

DISTRICT COURT JUDGE



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CASE NO. 3:14-CV-04105-EMC

JOINT STIPULATION TO EXTEND SCHEDULE